

**CHAITMAN LLP**  
**465 PARK AVENUE**  
**NEW YORK, NY 10022**  
**(888) 759-1114**  
TELEPHONE & FAX

**SUZAN ARDEN**  
*sarden@chaitmanllp.com*

August 27, 2019

**VIA ECF AND ELECTRONIC MAIL**

Honorable Stuart M. Bernstein  
United States Bankruptcy Court  
Southern District of New York  
One Bowling Green, Room 723  
New York, New York 10004-1408  
[Bernstein.chambers@nusb.uscourts.gov](mailto:Bernstein.chambers@nusb.uscourts.gov)

Re: *In re Bernard L. Madoff Investment Securities, LLC*, Adv. Pro. No. 08-1789  
*Picard v. Carol Nelson & Stanley Nelson*, Adv. Pro. No. 10-04377  
*Picard v. Carol Nelson*, Adv. Pro. No. 10-04658  
Request to Adjourn Briefing Schedule for Post-Trial Submissions

Dear Judge Bernstein:

This firm represents Carol and Stanley Nelson (the “Nelsons”) in the above-referenced matter. As this Court is aware, the Nelsons’ Post-Trial Proposed Findings of Fact and Conclusions of Law and opposition to the Trustee’s Supplemental Memorandum is presently scheduled for August 30, 2019. However, Ms. Chaitman underwent eye surgery on Monday, August 26, 2017 and, as such, will be unable to work on the filing materials in the days immediately preceding the present due date. We therefore request a brief adjournment of the due date, through and until September 6, 2019.

The Trustee has not consented to this adjournment, but instead has taken the position that he will not oppose our request if we also make a request on his behalf for an extensive adjournment of his time to respond to our motion to dismiss. See attached email correspondence at Exhibit A. To the extent that the Court simultaneously wishes to address the Trustee’s request to adjourn the motion to dismiss, we do not oppose an extension generally but would ask that, if the Trustee’s date to respond to the motion to dismiss is adjourned until October 23, 2019, that the Nelsons’ time to reply be extended in a like fashion, until November 11, 2019.

**CHAITMAN LLP**

Hon. Stuart M. Bernstein

August 27, 2019

Page 2

We request that the due date for the Nelsons' Post-Trial Proposed Findings of Fact and Conclusions of Law and opposition to the Trustee's Supplemental Memorandum, presently scheduled for August 30, 2019, be adjourned through and until September 6, 2019.

Respectfully submitted,

/s/ Suzan Arden

Suzan Arden

SA/aws

cc: *Via email and ECF*

David J. Sheehan, Esq. ([dsheehan@bakerlaw.com](mailto:dsheehan@bakerlaw.com))

Nicholas J. Cremona, Esq. ([ncremona@bakerlaw.com](mailto:ncremona@bakerlaw.com))